

1 Michael Kind, Esq.
2 Nevada Bar No.: 13903
3 **KIND LAW**
4 8860 South Maryland Parkway, Suite 106
5 Las Vegas, Nevada 89123
6 (702) 337-2322
7 (702) 329-5881 (fax)
8 mk@kindlaw.com
9 *Attorney for Plaintiff Keith Fricke*

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 Keith Fricke,

11 Plaintiff,

12 v.

13 The Hertz Corporation,

14 Defendant.

Case No.: 2:20-cv-00038-RFB-VCF

**Stipulation and order to extend
time for Plaintiff to respond to
motion to dismiss**

(First Request)

16 Keith Fricke (“Plaintiff”) and The Hertz Corporation (“Defendant” and
17 together with Plaintiff as the “parties”), by and through their respective counsel,
18 hereby submit this stipulation and order for an extension of time for Plaintiff to
19 respond to Defendant’s motion to dismiss the first amended complaint. Plaintiff’s
20 original complaint was served on December 9, 2019 and removed on January 8,
21 2020. (*See* ECF No. 1). Defendant moved to dismiss the original complaint on
22 January 15, (ECF No. 7), and Plaintiff filed his first amended complaint on January
23 29, (ECF No. 9). On February 12, Defendant filed its motion to dismiss the first
24 amended complaint, which is currently pending before the Court. (ECF No. 10).
25 Plaintiff’s response to that motion is presently due on February 26.
26
27

1 In good faith and not for the purposes of delay, Plaintiff requested a two-week
2 extension, and Defendant agreed to stipulate to that request. This is the first request
3 for an extension of this deadline.

4 The parties therefore stipulate that Plaintiff's response to Defendant's motion
5 to dismiss shall be due on or before **March 11, 2020**.

6 DATED this 26th day of February 2020.


7 **KIND LAW**

8
9 /s/ Michael Kind
10 Michael Kind, Esq.
11 8860 South Maryland Parkway, Suite 106
12 Las Vegas, Nevada 89123
13 *Attorney for Plaintiff Keith Fricke*

14 **LEWIS ROCA ROTHGERBER CHRISTIE LLP**

15 /s/ Brian D. Blakley
16 Brian D. Blakley, Esq.
17 Lewis Roca Rothgerber Christie LLP
18 3993 Howard Hughes Parkway, Suite 600
19 Las Vegas Nevada, 89169
20 *Attorney for Defendant The Hertz Corporation*

21 IT IS SO ORDERED:

22 
23 _____
24 RICHARD F. BOULWARE, II
25 UNITED STATES DISTRICT JUDGE

26 DATED this 27th day of February, 2020.
27